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 IMMIGRATION AND CUSTOMS  
 ENFORCEMENT and UNITED STATES  
 DEPARTMENT OF HOMELAND SECURITY

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

AMERICAN CIVIL LIBERTIES UNION,	)	Case No. 4:23-cv-03450-DMR
	)	
Plaintiff,	)	<b>DECLARATION OF JESSICA JONES</b>
v.	)	
	)	
UNITED STATES IMMIGRATION AND	)	
CUSTOMS ENFORCEMENT, and UNITED	)	
STATES DEPARTMENT OF HOMELAND	)	
SECURITY,	)	
	)	
Defendants.	)	

I, Jessica Jones, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Management Program Analyst with the Custody Management Division (“CMD”) of U.S. Immigration and Customs Enforcement (“ICE”) Enforcement and Removal Operations (“ERO”). I have held this position since July 2018. I also serve as a Contracting Officer’s Representative (“COR”) for certain contracts that further the mission of ERO. My position requires knowledge of ICE detention standards, knowledge of contract management, and ICE standards, including standards and policies as it relates to legal access and law library access in ICE detention facilities.

1           2.       My official duties and responsibilities include serving as the COR for the RELX contract  
2 for LexisNexis electronic law library (“ELL”). Since February 2022, I have served as a COR for  
3 electronic law library service contracts. As the COR, my primary duties include assisting the  
4 Contracting Officer with monitoring the prime contractor’s performance; ensuring that all technical  
5 requirements under the contract are met; timely delivery of products or services by the delivery date or  
6 within the period of performance; and at the price or within the estimated cost stipulated in the contract.

7           3.       I make this declaration in support of ICE’s Cross-Motion for Summary Judgment and  
8 Opposition to Plaintiff’s Motion for Summary Judgment in the above-captioned action. The statements  
9 contained in this declaration are based upon my personal knowledge, my review of documents kept by  
10 ICE in the ordinary course of business, and information provided to me by other ICE employees in the  
11 course of my official duties.

12           4.       On December 19, 2022, ICE entered into a contract with RELX for a subscription to the  
13 LexisNexis research service to provide access to legal research materials to detained noncitizens, which  
14 includes the provision of offline ELL materials on electronic hard drives (“EHDs”). The offline ELL  
15 materials provided by RELX on EHDs are hereinafter referred to as the “Offline Lexis Materials.”

16           5.       A true and correct copy of the contract referenced in paragraph 4 above, including the  
17 incorporated Statement of Work (Attachment A to the contract) is attached hereto as Exhibit A. True  
18 and correct copies of Attachments B through E to the contract are attached hereto as Exhibit B.

19           6.       Under ICE’s current contract with RELX, RELX furnishes the Offline Lexis Materials to  
20 ICE exclusively on EHDs and does not provide the materials on CD-ROM. Pursuant to the contract,  
21 RELX installs on the EHD the contracted for databases and the software required to make those  
22 databases function in the offline environment.

23           7.       The Offline Lexis Materials are maintained for the use of detained noncitizens in ICE  
24 custody. ICE personnel do not use the Offline Lexis Materials to conduct any agency research or  
25 decision-making.

26           8.       Responsibility for programming and maintaining the Offline Lexis Materials rests with  
27 the contractor, RELX, not the agency.

